

# EXHIBIT 3

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUBREY DRAKE GRAHAM,

Plaintiff,

v.

UMG RECORDINGS, INC.,

Defendant.

No. 1:25-cv-399-JAV

**DEFENDANT UMG RECORDINGS, INC.’S RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, Defendant UMG Recordings, Inc. (“UMG” or “Defendant”), by and through its undersigned counsel, provides the initial disclosures set forth herein (“Initial Disclosures”).

These Initial Disclosures are made solely for purposes of the above-captioned proceeding. UMG makes these Initial Disclosures prior to any discovery in this proceeding and based on the information reasonably available to it at this time. By making these disclosures, Defendant does not represent that it has identified every witness, document, electronically stored information, or tangible thing that is possibly relevant. UMG reserves the right to amend or otherwise modify or supplement the information contained in these Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(e) as more information becomes available during the course of any discovery in this proceeding, or as otherwise appropriate.

All categories of documents or information described by UMG herein are subject to all objections as to competence, relevance, materiality, and admissibility, as well as to any and all other objections on any grounds that would require the exclusion of the information or any portion

thereof if such information were offered in evidence, all of which are hereby expressly reserved and may be interposed at any time—including at any deposition or at or before any hearing or trial in this matter or any other action. UMG makes these disclosures subject to, and without waiving, its rights to protect from disclosure any and all documents and communications protected by the attorney-client privilege, the attorney work product doctrine, and any other privilege or discovery protection.

No actual, incidental, or implied admission is intended by these disclosures. These disclosures shall not be deemed an admission as to any fact in dispute or a waiver of any rights or defenses UMG has asserted or may assert with respect to any claim. UMG reserves the right to rely upon discoverable information from sources identified in Plaintiff's initial disclosures.

**A. Persons Likely to Have Discoverable Information under Federal Rule of Civil Procedure 26(a)(1)(A)(i)**

UMG states that the following individuals and entities are likely to have discoverable information that UMG may use to support its defenses, unless the use would be solely for impeachment:

Name	Subject Area	Contact
Gary Kelly	Mr. Kelly is likely to have discoverable information concerning revenues generated by the Recording and Video, and the delivery and distribution of the Recording, Image, and Video.	c/o Rollin Ransom Sidley Austin LLP 350 South Grand Street Los Angeles, CA 60603
Ramon Alvarez-Smikle	Mr. Alvarez-Smikle is likely to have discoverable information concerning marketing and promotion of the Recording and Video.	c/o Rollin Ransom Sidley Austin LLP 350 South Grand Street Los Angeles, CA 60603

Bill Evans	Mr. Evans is likely to have discoverable information concerning marketing and promotion of the Recording and Video.	c/o Rollin Ransom Sidley Austin LLP 350 South Grand Street Los Angeles, CA 60603
Greg Marella	Mr. Marella is likely to have discoverable information concerning promotion of the Recording.	c/o Rollin Ransom Sidley Austin LLP 350 South Grand Street Los Angeles, CA 60603
Jim Roppo	Mr. Roppo is likely to have discoverable information concerning Drake's contractual relationship with UMG, and UMG's promotion of Drake's recordings.	c/o Rollin Ransom Sidley Austin LLP 350 South Grand Street Los Angeles, CA 60603
David Kaefer	Mr. Kaefer is likely to have discoverable information concerning the N.Y. G.B.L. § 349 claim as it relates to Spotify.	Counsel to Spotify USA Inc.
Aubrey Drake Graham ("Drake")	Drake is likely to have discoverable information concerning, among other subjects, his contractual relationship with UMG, his reputation, and his alleged damages.	c/o Michael Gottlieb Willkie Farr & Gallagher LLP 1875 K Street NW Washington, DC 20006
Kendrick Lamar Duckworth ("Lamar")	Lamar is likely to have discoverable information concerning the creation of the Recording, Image and Video, and the distribution and promotion of the Recording and Video.	c/o Brian Caplan Reitler Kailas & Rosenblatt LLP 885 Third Ave, 20th Floor New York, NY 10022
Anthony Saleh	Mr. Saleh is likely to have discoverable information concerning UMG's contractual relationship with Lamar, and marketing and promotion of the Recording and Video.	c/o Brian Caplan Reitler Kailas & Rosenblatt LLP 885 Third Ave, 20th Floor New York, NY 10022

If and as discovery progresses, and as otherwise appropriate, UMG reserves the right to

supplement, amend, or otherwise modify the identification of individuals or entities who may have discoverable information, including, without limitation, potentially supplementing with the names of individuals listed by Plaintiff in his initial disclosures. UMG also reserves the right to call any individuals identified by Plaintiff in his initial disclosures to testify in connection with this proceeding.

**B. Copy or Description by Category and Location of Documents, Electronically Store Information and Tangible Things under Federal Rule of Civil Procedure 26(a)(1)(A)(ii)**

Based upon the information now reasonably available to UMG, UMG states that it has in its possession, custody, or control the following categories of documents that it may use to support its defenses, unless the use would be solely for impeachment:

- Contracts and agreements between UMG and Drake, and documents concerning UMG's contractual relationship with Drake.
- The other recordings in Drake and Lamar's rap feud, and documents concerning the distribution, marketing and promotion of the other recordings in the feud.
- The petition entitled *Art on Trial: Protect Black Art*, appended as Exhibit A to UMG's request for judicial notice in support of its motion to dismiss ("RJN").
- Other recordings by Drake, and documents concerning the same, including, but not limited to, those appended as Exhibits B, C and Z to UMG's RJN.
- News reports and documents concerning (i) Drake's relationships with and behavior around minors, (ii) the criminal charges and conviction of Baka Not Nice (Travis Savoury), and (iii) the rap feud between Drake and Lamar, including, but limited to, the documents appended as Exhibits N-X to UMG's RJN.
- The Affirmation of David Kaefer, appended as Exhibit Y to UMG's RJN.

These records will be made available at the offices of Sidley Austin LLP, 787 Seventh Ave, New York, NY 10019. The disclosure of such records may be limited by any applicable foreign privacy or data-transfer rules. If and as discovery progresses, and as otherwise appropriate, UMG reserves the right to supplement, amend, or otherwise modify these categories of documents. UMG also reserves the right to rely upon documents, electronically-stored information, and tangible things in the possession, custody, and control of Plaintiff, and/or non-parties.

**C. Computation of Each Category of Damages Claimed under Federal Rule of Civil Procedure 26(a)(1)(A)(iii)**

UMG makes this disclosure based upon the pleadings filed to date. UMG disputes that Plaintiff has suffered any damages. UMG reserves the right to seek attorneys' fees, costs, and disbursements to the extent permitted under law.

**D. Insurance Agreement under Federal Rule of Civil Procedure 26(a)(1)(A)(iv)**

UMG will make available for inspection and copying any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: March 24, 2025

*/s/ Rollin A. Ransom*

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